



ZINC CORPORATION OF AMERICA

PALMERTON, PA 18071 215 826-2111

November 5, 1991

Mr. E. E. Erickson,
Regional Administrator, Region III,
U.S. Environmental Protection Agency,
841 Chestnut Street - 9th Floor,
Philadelphia, Pa. - 19107.

Dear Administrator Erickson:

Subsequent to the conversations you and Jim Davis had this morning we have had discussions with both Bill Early and Karen Wolper in which we reviewed the EPA and PRP's positions relative to the Palmerton site cleanup.

These conversations were helpful. As we now have a better understanding of EPA's position, hopefully you and your staff will have a better understanding of the PRP's position. It is now essential for us to meet with you on Thursday afternoon. May we please have a time that is convenient for you?

At that meeting we would specifically like to review the following major elements that we believe led EPA to its current position:

- . The protocol and its implementation used for the 24 home sampling.
- . The Palmerton Hospital blood/lead study.
- . The analytical procedures and results of the sampling analysis.
- . The toxicology report on which the September 5 removal decision was based.
- . The post-decision toxicologist reports.
- . The adequacy of the administrative record.
- . The PRP proposal.

As soon as you have a time for our Thursday meeting we will also coordinate with your office to find out who from your staff will be attending so that we may add corresponding personnel to our group.

We appreciate your assistance in setting up this meeting and believe that an open discussion of the above items, and any others that you want to add, will be helpful to both the EPA and the PRP's.

G. A. WICKHAM
President and C.E.O.
Zinc Corporation of America

Sincerely yours,

J. H. DAVIS
President and C.E.O.
Horsehead Resource Development Co., Inc.

cc-B. Early
K. Wolper

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